

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF PLAINTIFF
NETLIST INC.'S ADDITIONAL MOTIONS *IN LIMINE*
(MICRON CASE NO. 2:22-CV-294)**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Plaintiff Netlist, Inc.’s Additional Motions *in Limine* (Micron Case No. 2:22-cv-294). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of Netlist’s Second Supplemental Responses and Objections to Micron’s First Set of Interrogatories (Nos. 1-15), dated November 19, 2023.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of the Pretrial Conference Volume 2 transcript on March 29, 2023 in Case No. 2:21-CV-463-JRG.

4. Attached as **Exhibit 3** is a true and correct excerpted copy of the Tyler Morton deposition transcript on November 20, 2023.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the Frank Ross deposition transcript on November 20, 2023.

6. Attached as **Exhibit 5** is a true and correct excerpted copy of the Scott DeBoer deposition transcript on September 7, 2023.

7. Attached as **Exhibit 6** is a true and correct excerpted copy of the Scott Cyr deposition transcript on November 20, 2023.

8. Attached as **Exhibit 7** is a true and correct excerpted copy of the Harold Stone deposition transcript on February 12, 2024.

9. Attached as **Exhibit 8** is a true and correct excerpted copy of the Expert Report of Dr. Harold Stone Regarding Issues Related to and Non-Infringement of Plaintiff’s U.S. Patent Nos.

7,619,912 and 11,093,417.

10. Attached as **Exhibit 9** is a true and correct copy of Netlist's First Notice of Deposition of Defendants Micron in Case No. 2:21-CV-203-JRG, dated May 15, 2023.

11. Attached as **Exhibit 10** is a true and correct copy of email correspondence between Y. Zhao and R. Park.

12. Attached as **Exhibit 11** is a true and correct excerpted copy of the Boe Holbrook deposition transcript on August 30, 2023.

13. Attached as **Exhibit 12** is a true and correct copy of Netlist's First Notice of Deposition of Defendants Micron Pursuant to Rule 30(b)(6) in the above captioned case, dated October 19, 2023.

14. Attached as **Exhibit 13** is a true and correct copy of email correspondence between M. McCullough and Y. Zhao.

Executed on February 20, 2024.

By /s/ Jason G. Sheasby
Jason G. Sheasby